



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
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December 22, 2016

Mr. Steven Dunsmore, Plant Manager
Ashland LLC
100 Big Sandy River Road
Kenova, WV 25530

RE: **Permit Applicability Determination**
Ashland LLC
Neal Plant
Plant ID No. 099-00009
Determination No. PD16-068

Dear Mr. Dunsmore:

It has been determined that your proposed reactor replacement project at the Neal Plant is not defined, pursuant to §45-13-2.17, as a "modification" or, pursuant to §45-14-2.40, as a "major modification." This determination is based on the information in your Permit Determination Form (PDF) submitted on November 21, 2016 that indicates that the burner improvement project will not result in any increase in the potential-to-emit (PTE) of the facility, will not result in a significant emission increase calculated according to the procedures outlined under §45-14-3.4, or *trigger* a substantive requirement of any State or Federal air quality regulation.

Please be aware that any future changes to the facility may trigger the requirement to obtain a permit if the changes are defined as a "modification" under 45CSR13 or as a "major modification" under 45CSR14.

Should you have any questions, please contact the undersigned engineer at (304) 926-0499 x1219.

Sincerely,

Joe R. Kessler, PE
Engineer